

Message

From: Ayres, Sara [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=CE5147A6A41E4AD488630393BB12C3F0-AYRES, SARA]
Sent: 10/30/2018 1:16:30 PM
To: Fellner, Christian (Fellner.Christian@epa.gov) [Fellner.Christian@epa.gov]
CC: Chatfield, Ethan [chatfield.ethan@epa.gov]; Eddinger, Jim (Eddinger.Jim@epa.gov) [Eddinger.Jim@epa.gov]
Subject: FW: 40 CFR 63 Subpart DDDDD Question

Importance: High

Christian,

Have we seen an argument like this before on Dc? If states are going to make these types of arguments, we may need to raise the issue with the MM2A rule folks? I don't think we envisioned that people who got out of the MACT would be drawn into the NSPS as new sources because of changes in maintenance practices. Let me know if you think we need a call or something to discuss. Thanks.

Sara Ayres
Air Branch
USEPA / OECA / OC / MAMPD
ayres.sara@epa.gov
(312) 353-6266

From: Chatfield, Ethan
Sent: Monday, October 29, 2018 10:16 AM
To: Ayres, Sara <Ayres.Sara@epa.gov>; Eddinger, Jim <Eddinger.Jim@epa.gov>
Subject: FW: 40 CFR 63 Subpart DDDDD Question
Importance: High

Interesting question, who is the HQ Subpart Dc contacts? Seems like actual to actuals on an hourly NSPS basis would be very small, but not sure we can say zero.

From: Briana.Mastriana@epa.ohio.gov [mailto:Briana.Mastriana@epa.ohio.gov]
Sent: Monday, October 29, 2018 9:09 AM
To: Chatfield, Ethan <chatfield.ethan@epa.gov>
Subject: 40 CFR 63 Subpart DDDDD Question
Importance: High

Hello Ethan,

I have a question for you regarding 40 CFR 63 Subpart DDDDD.

A facility wishes to opt out of Major Source Boiler MACT. This action, if approved, will remove tuneup and other requirements for the boiler. Without required tuneups and other Major Source MACT requirements, SO2 and PM emissions will increase - at least that is how it should be viewed according to EPA documents.

Would the increase in SO2 and PM emissions trigger NSPS subpart Dc requirements for an old 30 MMBtu/hr boiler permitted to burn fuel oil? NSPS subpart Dc regulated pollutants are SO2 and PM.

The EPA applicability determination (Control Number A057) that reported a new maintenance program that increased an NSPS regulated pollutant would trigger the applicable NSPS requirement.

The elimination of required tuneups and other Major Source Boiler MACT requirements looks like it qualifies as a new maintenance program. As NSPS regulated pollutant emissions look to increase, would the change proposed trigger the applicable NSPS subpart Dc?

Any clarification and guidance on this would be greatly appreciated.

Please let me know if you have any questions.

Thank you in advance,

Briana Mastriana

Environmental Specialist 2

MACT Coordinator

Work: (614)-644-3698

briana.mastriana@epa.ohio.gov

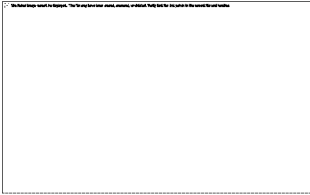
Ohio EPA – Central Office –


Division of Air Pollution Control

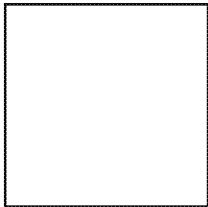
50 West Town Street Suite 700

P.O. Box 1049

Columbus, OH 43216-1049



 Please consider the environment before printing this e-mail



Did You Know: Children of parents who talk to their teens about drugs are up to 50% less likely to use. Start the conversation: StartTalking.Ohio.Gov

This email is intended for the sole use of the intended recipient and may contain privileged, sensitive or protected information. If you are not the intended recipient, be advised that the unauthorized use, disclosure, copying, distribution, or action taken in reliance on the contents of this communication is prohibited. If you have received this email in error, please notify the sender via telephone or return email and immediately delete this email.